

# NAPAR

North  
American  
Perishable  
Agricultural  
Receivers

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## Contributor Members

A & J Produce Corp.  
A. Vassallo, Inc.  
Andrews Brothers, Inc.  
Capital City Fruit Co., Inc.  
Caribbean Produce Exchange, Inc.  
Castellini Company  
W. D. Class & Son  
Community-Suffolk, Inc.  
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D'Arrigo Bros. Co. of New York  
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Wakefern Food Corporation  
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Agricultural Marketing Service  
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Washington, DC 20250-0240

Dear Mr. Priester:

Re: United States Standards for Grades of Persian (Tahiti) Limes  
**Docket #FV-04-309**

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Washington, DC, representing independent produce wholesale receivers. NAPAR members are predominantly small businesses with combined annual sales in excess of \$4 billion. NAPAR formed an operating alliance with the Food Marketing Institute in 1999, enabling it to function independently while expanding the services to its members.

On behalf of our members, I appreciate the opportunity to submit comments to USDA and hope our perspective is helpful in determining the need to precede with a revision to the U.S. Standards for Grades of Persian (Tahiti) Limes.

Having surveyed many of our wholesale receiver members on this issue, the overwhelming reaction is that the color requirements in all the U.S. lime grades are overly complex and members feel strongly that the juice content requirement of the U.S. No.1 grade is difficult to apply. The color requirements for U.S. No.1 and U.S. No.2 grades stipulating that three-fourths and one-half of the surface be of good green color respectively seem simple on the surface. They become somewhat confusing, however, when the two grades are blended -

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forming the U.S. Combination grade - and become even more confusing when the terms "Turning", or "Mixed Color" are added to the grade.

A determination of "Yellowing" designates a Turning grade and a determination of "Blanching" designates a Mixed Color grade, each of which imposes a very different market value on the product. While "Yellowing" and "Blanching" describe very different defects in the fruit, they are not always easy to differentiate from one another on the inspection floor. In fact, it can be difficult to tell one from the other under certain artificial lighting conditions. This is particularly troublesome during night-time hours.

The requirement for limes meeting the U.S. No.1 grade to have a juice content of not less than 42 percent by volume presents a cumbersome proposition. The volume of the sample has to be measured, the juice squeezed from the sample and calculated as a percentage of the total weight. The entire process requires specialized equipment and a time span of several days which, in the end, renders it of little value.

Our members believe that the U.S. Standards for Grades of Persian (Tahiti) Limes should be updated and simplified in order to make them more meaningful in the marketplace. If the determination is to proceed, we welcome the opportunity to work with USDA through the grade-change process.

Sincerely,



Patrick A. Davis  
President